

COMPLAINT

(for filers who are prisoners without lawyers)

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Trevor L. Young JR.

v.

Case Number:

(Full name of defendant(s))

(John Doe)

(to be supplied by Clerk of Court)

A. PARTIES

1. Plaintiff is a citizen of Wisconsin, and is located at
(State)

Dodge Correctional Institution P.O. Box 700 Waupun, WI 53963
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant (John Doe)
(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

and (if a person) resides at Unknown
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Unknown
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

~~While investigating a homicide incident the lead detectives were Rosemarie Galindo and Michael Washington of the Criminal Investigations Bureau, they were also assisted by Detective Vincent Lopez and Sgt. Erwin Estacio. The case was prosecuted by d.a. Michael Schindhelm in front of Judge David Borowski with the actual trial taking place in front of Judge Jeffrey Wagner. On or about 1-19-21 detectives Jeffrey Sullivan and Vincent Lopez had the plaintiffs car towed off the street with no knowledge giving before during or after. The vehicle was a dark colored 2005 Audi A6 4.2 Quattro, with a temp plate in the back window (T7980T). After calling around~~

While investigating the 2020 homicide of 'CLM' the lead detectives were Rose Marie Galindo and Michael Washington of the Criminal Investigations Bureau of Milwaukee, WI.

They were assisted by Detectives Vincent Lopez, Jeffrey Sullivan, Sgt. Erwin Estacio etc. The case was prosecuted by district attorney Michael Schindhelm in front of Judge David Borowski with the actual trial taking place in front of Judge Jeffrey Wagner. Trial counsel for me was Russell Jones. On or about 1-19-21 detectives Jeffrey Sullivan & Vincent Lopez had my car removed off the streets with no notification giving to me before during or after. My vehicle was a 2005 Audi A6 4.2 quattro with a dealership temp tag (T7980T). After calling around I was notified by the city tow lot that my vehicle was located there with a hold on it from police. After talking with Sullivan and Lopez via cell phone I contacted Internal Affairs and spoke with a Sgt.

Washington whom informed me that my car would be returned by the end of the 1st week after 'processing' was completed according to detectives. This 1st week was around February 2021, at this time both Lopez & Sullivan told me that I would not get my car without coming to speak with them first, which I was not obligated to do, I also offered multiple times for them to come see me since I had no transportation means due to them having my vehicle but they refused. Due to my vehicle being wrongfully unlawfully seized I lost my job, wages and beneficial job opportunities. My vehicle was released after the 4-21-22 trial was completed which I was found

guilty at. The homicide was believed to have occurred inside of the victims vehicle which was in police's possession as of 1-6-21 until the release of this vehicle on crime scene, to the next of kin on 4-8-21 which was about 13 days before I was taken into custody for a totally different situation. A report from Rosemarie Galindo states that on 4-8-21, Sgt. Estacio approved the release of the victims vehicle. Lopez sent a e-mail to Joseph Anderer assigned to the City tow lot relating that the vehicle could be released. Rosemarie Galindo authorized a PO-5 on the title which was signed by Estacio. It was bad faith getting rid of this critical key piece of evidence because the 'defendant' was not in custody and this vehicle was potentially exculpatory. Rosemarie and other officers testified to knowing that all physical evidence should be preserved until the defense had a chance to inspect/examine it, also the police theory is that the killer got in on the passenger side before killing the victim who was later found with their driver side window completely down. My DNA was excluded as any DNA found on the outside/inside of the vehicle. Medical examiner report and testimony lists the wound entry being from the left (anatomical wise) at an indeterminate range. Indeterminate being described as more than 2 ft away. These findings are inconsistent with the police theory but testing the trajectory of the blood splatter or additional bullet strikings can't be

found in the photographs took by police. During prelim Lopez stated that there was nothing to distinguish the car believed to be mine from any other car of its make/model. At trial Sgt. Estacio revealed that he was the one who 'identified' the car on video and that it was a specific Audi A6 2005-2008 2.0 model not my 2005 Audi A6 4.2 Quattro model. Michael Schindhelm engaged in multiple acts of prosecutorial misconduct when he made known false statements to secure the prejudicial joinder, misleading statements known to be untrue during trial and the statement of being not sure as it pertains to the homicide. During the joinder hearing he kept referring to a firearm found during my arrest as being the homicide weapon which a NFIN test had already proved it not to be, before this hearing. He also told the jurors at trial that the alleged victim for one of the misjoined cases who didn't show to trial, recent statement was not credible. Judge Borowski joined the cases even after noting on record that there would be prejudice towards me. Judge Wagner allowed for testimonial hearsay to be admitted into trial and over ruled obvious prejudice when objected to. Russell Jones presented no defense nor called any named witnesses, one of whom was my alibi witness. I still maintain my innocence. Judge Borowski also denied me my right to represent myself even after being found competent and the 'not sure' comment, was made at sentencing by the D.A.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

\$ 250,000.00 for emotional distress, mental stress and loss of wages due to seizure of ~~my~~ car

\$ 20,000.00 per month for every month I've ~~sat~~ been in custody

Speedy appeal process

Dismissal and/or reversal

E. JURY DEMAND

I want a jury to hear my case.

☐ - YES

☒ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 27th day of November 2022.

Respectfully Submitted,

Treva Young

Signature of Plaintiff

546255

Plaintiff's Prisoner ID Number

Dodge Correctional Institution

P.O. Box 700 Waupun, WI 53963

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.